



## THE CITY OF SAN DIEGO

February 23, 2005

Mr. Daniel Borunda  
Environmental Protection Specialist  
USIBWC, Compliance Section  
4171 North Mesa Street, C-100  
El Paso, Texas 79902

Dear Mr. Borunda:

Subject: Draft Supplemental Environmental Impact Statement (SEIS) Clean Water Act  
Compliance at the South Bay International Wastewater Treatment Plant

The City of San Diego has reviewed the subject SEIS, and we are in concurrence with the proposed preferred alternative identified as Alternative 4, Treatment Option C: Bajagua<sub>LLC</sub> Proposal. As you may know, the San Diego City Council approved a resolution on January 22, 2002, supporting the development of a privately funded facility in Mexico for secondary treatment of effluent from the South Bay International Wastewater Treatment Plant (SBIWTP), as proposed by Bajagua<sub>LLC</sub>. Additionally, we concur with the elimination of Alternative 3: Operate SBIWTP with City of San Diego Connections, from further consideration. On November 20, 2002, the Rules, Finance and Intergovernmental Relations Committee of the City Council voted unanimously to deny a request from the International Boundary and Water Commission (IBWC) to treat Tijuana sewage in the City's Metro system on an interim basis. The City believes such treatment would pose substantial risks, and, therefore, we do not support any alternatives that require treatment of Tijuana sewage in the City's system.

The City also has the following correction to the description of the City's system on page 2-16.

All flow going to the South Bay Water Reclamation Plant is pumped to the plant via the Grove Avenue Pump Station. The Grove Avenue Pump Station receives flow from the diversion of the San Ysidro Trunk Sewer and from the diversion of the South Metro Interceptor at the Otay River Pump Station. All flow that is not diverted continues to flow north to the Point Loma Wastewater Treatment Plant. All flow from the Tijuana Emergency Connection is conveyed into the San Ysidro Trunk Sewer. Under Alternative 3, if the IBWC were to send 14 mgd of flow to the City's system through a new connection, all of that flow would go to the South Bay Water Reclamation Plant,



### Metropolitan Wastewater Department

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no flow would go to Point Loma. City flows that would normally be diverted at the Otay or Grove Avenue pump stations would continue to flow north to Point Loma. The only ways that Tijuana flows would be treated at the Point Loma Wastewater Treatment Plant are: (1) if there were a direct connection to the South Metro Interceptor north of the diversion for the Otay River Pump Station, or (2) if 13 mgd of Tijuana flow were conveyed through the emergency connection to the San Ysidro Trunk Sewer commingling with City sewage; 15 mgd would be diverted at the Grove Avenue Pump Station to the South Bay Water Reclamation Plant and the remainder would flow north to Point Loma.

We appreciate your consideration of our comments. We look forward to working with you to implement a solution to the long standing border sanitation problem. If you have any questions, please call me at (858) 292-6401.

Sincerely,



Scott Tulloch  
Director

WST:aks

cc: Honorable Mayor, Dick Murphy, MS 10A  
Councilmember Scott Peters, District 1, MS 10A  
Councilmember Michael Zuccet, District 2, MS 10A  
Councilmember Toni Atkins, District 3, MS10A  
Councilmember Tony Young, District 4, MS 10A  
Councilmember Brian Maienschein, Distret 5, MS 10A  
Councilmember Donna Frye, District 6, MS 10A  
Councilmember Jim Madaffer, District 7, MS 10A  
Councilmember Ralph Inzunza, District 8, MS 10A  
Richard Mendes, Deputy City Manager, MS 9B  
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